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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION**

IN RE SUBPOENA OF  
RICHARD SEDDON.

Case No. 1:22-MC-00008-BLG-SPW-TJC

**DECLARATION OF STEPHEN R.  
KLEIN IN SUPPORT OF  
PROJECT VERITAS'S MOTION  
TO QUASH SUBPOENA TO  
PRODUCE DOCUMENTS AND  
INFORMATION**

I, Stephen R. Klein, certify and declare as follows:

1. I submit this declaration in support of Project Veritas's Motion to Quash Subpoena to Produce Documents and Information. I make this declaration based on my personal knowledge.

2. I am a member in good standing of the bars of the District of Columbia, Michigan and Illinois and will file for admission *pro hac vice* to appear in this matter if such application becomes necessary. I am a partner at Barr & Klein PLLC and represent Defendants Project Veritas and Marisa Jorge in the case *AFT Michigan v.*

*Project Veritas, et al.*, 17-CV-13292 (E.D. Mich.) (“the Lawsuit”) from which the subpoena at issue arose.

3. Attached hereto as **Exhibit A** is a true and correct copy of the Notice of Re-Issued Subpoena and Subpoena served via e-mail by opposing counsel Mark Cousens on May 25, 2022.

4. Attached hereto as **Exhibit B** is a true and correct copy of the Opinion and Order Granting Plaintiff’s Motion to Take Deposition from R. Seddon, ECF No. 207 on the Lawsuit docket.

5. Attached hereto as **Exhibit C** is a true and correct copy of the Second Amended Complaint and Demand for Trial by Jury (Supplemental Pleading), ECF No. 72 on the Lawsuit docket.

6. Attached hereto as **Exhibit D** is a true and correct copy of Defendant Project Veritas’s Responses to Plaintiff’s Requests for Production of Documents, served via e-mail to opposing counsel on March 5, 2019.

7. Attached hereto is **Exhibit E** is a true and correct copy of Defendant Project Veritas’s Responses to Plaintiff’s First Set of Interrogatories and Second Requests for Production of Documents, redacting personal identifying information of four persons. An unredacted version of the document was served via e-mail to opposing counsel on January 3, 2020.

8. Aside from the requests reflected in Exhibits D and E, AFT Michigan served no other document requests upon Project Veritas during discovery in the Lawsuit.

9. Attached hereto as **Exhibit F** is a true and correct copy of the Opinion and Order on Non-Party Movant Weingarten's Motion for Protective Order, Defendants' Motion to Compel and Plaintiff's Motion to Compel, ECF No. 152 on the Lawsuit docket.

10. Aside from AFT Michigan's motion to compel reflected in the opinion and order in Exhibit F, AFT Michigan sought no other motion to compel documents following Project Veritas's objections and responses in Exhibits D and E.

11. Attached hereto as **Exhibit G** is a true and correct copy of the initial subpoena allegedly served to Richard Seddon, ECF No. 198-1 on the Lawsuit docket.

12. Attached hereto as **Exhibit H** is a true and correct copy of the Stipulated Order With Respect to Defendants' Motion to Stay, ECF No. 156 on the Lawsuit docket.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed in the City of Alexandria, Virginia, on June 9, 2022.

  
\_\_\_\_\_  
Stephen R. Klein

**CERTIFICATE OF SERVICE**

I hereby certify that on the 9th day of June, 2022, a true and correct copy of the foregoing document was mailed, postage prepaid, and by electronic mail to the following:

☒ U.S. Mail  
☐ FedEx  
☐ Hand-Delivery  
☐ Facsimile  
☒ Email

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/s/ Brad J. Brown  
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